

UNITED STATES DISTRICT COURT
for the
DISTRICT OF MASSACHUSETTS

PAUL T. PAPADAKIS,
Plaintiff,

v.

CSX TRANSPORTATION, INC.,
Defendant.

C.A. No.: 04-30189-MAP

**THE DEFENDANT, CSX TRANSPORTATION, INC.'S,
ASSENTED TO MOTION FOR AN EXTENSION OF TIME TO RESPOND TO THE
PLAINTIFF'S MOTION TO COMPEL DISCOVERY RESPONSES**

The defendant, CSX Transportation, Inc. ("CSX") hereby submits this *Assented to Motion for an Extension of Time to Respond to the Plaintiff's Motion to Compel Discovery Responses* ("Motion"). As grounds therefore, the defendant states as follows:

Upon receipt of the plaintiff's *Motion to Compel Answers to Interrogatories* and its *Motion for an Order Compelling Production of Documents on the Defendant*, counsel for the defendant continued and intensified its diligent search for information responsive to the plaintiff's discovery requests. The parties hereby agree that they jointly request that the plaintiff's *Motions* not be acted on for the next week while the defendant obtains the responsive documents and information. Therefore, counsel for the plaintiff has agreed to allow the defendant until March 28, 2005 by which to supplement its previous *Answers to Interrogatories* and *Responses to Requests for the Production of Documents* in order to avoid an *Order* being entered by this Honorable Court. Counsel for both parties have agreed that if the defendant fails to provide supplemental discovery responses, the plaintiff will move forward with his *Motions*.

If the plaintiff moves forward with his *Motions*, the defendant shall have five business days by which to file an appropriate *Opposition*.

WHEREFORE, the parties respectfully request that this Honorable Court stay any action on the plaintiff's *Motion to Compel Answers to Interrogatories* and its *Motion for Order Compelling Production of Documents on the Defendant, CSX Transportation, Inc.* until contacted further by the parties.

Respectfully submitted,
The Plaintiff,
PAUL T. PAPADAKIS,
By his attorney,

The Defendant,
CSX TRANSPORTATION, INC.,
By its attorneys,

/s/ Robert M. Byrne
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Dated: March 22, 2005

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